

# **EXHIBIT A**

**Lewis  
Baach  
Kaufmann  
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PLLC

Adam S. Kaufmann  
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March 23, 2021

**By Email and First Class Mail**

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**Re: Aidan Karibzhanov // Global Retention of Materials**

Dear Mr. Kryukov,

We are attorneys in Manhattan retained by Makhpal Karibzhanova to assist her in the recovery of marital assets beneficially owned by her former husband, Aidan Karibzhanov, one-half of which are legally owed to Ms. Karibzhanova under Kazakh law. We apologize for this intrusion, but we are obligated to pursue a global investigation into Mr. Karibzhanov's assets and sources of wealth on behalf of our client.

We are in the process of preparing legal actions to secure and protect our client's rights to the equitable apportionment of marital assets following her divorce from Mr. Karibzhanov. Such actions will be filed in multiple jurisdictions around the world. We have reason to believe that you currently are acting or have previously acted as Mr. Karibzhanov's business associate and/or advisor in the United States, specifically in New York. As such, we further believe that you personally have access to or possession of records relating to Mr. Karibzhanov's business transactions and assets, whether held in his name or the name of a beneficiary or nominee, such as yourself, and possess records and communications relating to the same.

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This letter serves as legal notice pertaining to the retention of communications, documents, and evidence implicated in our client's case against Mr. Karibzhanov. Documents and communications in your actual and constructive possession constitute evidence of our client's claims against assets and property interests beneficially owned by Mr. Karibzhanov. You are hereby directed to maintain and preserve all such documents and communications relating to Mr. Karibzhanov and to his ownership of investment interests, properties, and assets, including but not limited to the specific interests described below.

We have good cause to believe that certain of Mr. Karibzhanov's assets are held in the names of third-party owners (strawmen) or through shell companies. Therefore, this cautionary letter should be read not just to impact documents that expressly reference Mr. Karibzhanov, but also those that relate to assets he holds through third parties, shell companies and investment vehicles including but not limited to those set forth below.

The scope and type of documents identified for preservation are broad. As a result, you must ensure that all documents of potential relevance continue to be preserved. Business records, account statements, receipts, contracts, emails, text messages, and other evidence, in both paper and electronic format, constitute evidence of Mr. Karibzhanov's ownership of or interests in assets. This includes documents that may be stored in locations such as hard drives, shared drives, desktop subfolders, tapes stored with third party vendors, flash drives and discs, home computers, PDAs, databases and systems. Any destruction of documents, emails, text messages or other items could interfere with the collection and use of evidence and may well lead to legal consequences for you, as a resident of New York subject to the laws and jurisdiction of New York courts, as well as for Mr. Karibzhanov.

By receipt of this letter, your legal obligation to preserve documents relevant to this matter is hereby triggered. It extends not only to you, but to any entities and employees of entities in which you hold ownership (directly or indirectly; jointly or severally) or exercise control over as well as all persons purporting to act on your behalf.

In addition to the preservation of documents and information, I remind you that moving, concealing, or otherwise dissipating assets to frustrate legal and regulatory proceedings is a violation of criminal and civil laws under both the federal laws of the United States and the laws of the State of New York. If you have local legal counsel, they may advise you as to the seriousness and enforceability of this demand and consequences for failure to observe its terms or interfere with the investigation of Mr. Karibzhanov's assets.

This letter further puts you on notice that Ms. Karibzhanova has formally retained counsel in this matter. You are hereby informed that Ms. Karibzhanova does not wish you to contact her in any fashion. Please direct all correspondence and communications to me. Do not attempt to reach or confront Ms. Karibzhanova directly or indirectly through third parties. Please be advised that any conduct which may be interpreted as an attempt to dissuade Ms. Karibzhanova from pursuing her

legal rights or deny her access to information, directed at Ms. Karibzhanova directly or any member of her family, may well be subject to criminal prosecution by the Office of the District of Attorney of New York.

The following is a non-exhaustive list of persons, legal entities, and financial institutions as to which the above-described records are sought to be preserved:

- All communications between you and Aidan Karibzhanov.
- Records of payments from Aidan Karibzhanov to you or to any account intending to benefit you, as well as from you to Aidan Karibzhanov or to any account intended to benefit Aidan, whether involving Aidan Karibzhanov directly or with any third party.
- All communications between you and Jasmin Karibzhanova and/or Iman Ainek Karibzhanova.
- Records of payments from Jasmin Karibzhanova and/or Iman Ainek Karibzhanova to you as well as from you to Jasmin Karibzhanova and/or Iman Ainek Karibzhanova, whether involving Jasmin Karibzhanova and Iman Ainek Karibzhanova directly or with any third party.
- All communications and transactions between you and Marie Helene Berard, Almas Chukin, Damir Karassayev, Nikolay Varenko, Roland T. Nash, Frank Mosier, Vartan Dilanyan, Michael Sauer, Michael A. McNicholas, Michael C. Carter Jr., Vladislav Kim, Gulzhamash Zaitbekova, Gaukhar Zaitbekova, and/or Aigul Nurmakhanova that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- All communications and transactions between you and Karim Massimov, Timur Kulibayev, Dinara Nazarbayeva, Goga Ashkenazi, Arvind Tikku, Aigul Nuriyeva, Lubov Chernukhin (née Golubeva), Umut Shayakhmetova, Raushan Sagdiyeva, Kairat Boranbayev, Kenes Rakishev, Ablay Myrzakhmetov, Mirbulat Abuov and/or Almaz Irishev that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- All communications and transactions between you and Yasmine Petty that in any way pertain to Aidan Karibzhanov and his instructions.
- Visor Group, Visor Capital, and/or Visor International DMCC, and all parents, subsidiaries, affiliates, related entities, employees, and agents.

- Verno Group, Verno Capital, VIML Limited, Verno Advisers AG, Kazakhstan Infrastructure Fund, and/or VPE Capital, and all parents, subsidiaries, affiliates, related entities, employees, and agents.
- Airbus Helicopters (Eurocopter), Kazakhstan Temir Zholy, Alstom, Kazatomprom, Areva, and all parents, subsidiaries, affiliates, and related entities, employees, and agents. All communications between you and Nicolas Sarkozy, Pierre Olivier Sarkozy, Damien Loras, Claude Guéant, Jean-François Etienne des Rosaies, Catherine Degoul, Marguerite Bérard, Thomas Andrieu, Thomas Enders, Alexander Mashkevitch, Patokh Chodiev, Jean S. Galiev, Berlin Irishev and/or Askar Mamin that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Verno-related project involving Rostec Corporation, Russian Helicopters, Russian Direct Investment Fund, Tawazun Holding, Mubadala Development Company PJSC, MDGH – GMTN B.V. (formerly, MDC GMTN B.V.), and/or Sibur Holding, and all parents, subsidiaries, affiliates, and related entities, employees, and agents. Also including information relating to sales of dual-use technology, military equipment and military helicopters to India, Pakistan, and other countries. All communications between you and Sergey Chemezov, Denis Manturov, Kirill Dmitriev, and/or Kirill Shamalov that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- ArcelorMittal S.A., ArcelorMittal USA LLC, Arcelor International America LLC, and/or ArcelorMittal Temirtau JSC, Lakshmi Mittal, and all parents, subsidiaries, affiliates, related entities, employees, and agents.
- PetroChina Company Limited, Mangistaumunaigaz, Mangistau Investments B.V., JP Morgan Chase, Citibank, Templeton Asset Management (Singapore), Franklin Resources Inc, Caspian Investments Resources Limited (formerly, Nelson Resources Limited), China Petroleum & Chemical Corporation, Cott Holdings Group Ltd, Energy Investments International, and/or Central Asian Industrial Holdings B.V., and all parents, subsidiaries, affiliates and related entities, employees, and agents. All communications between you and Lakshmi Mittal, Mark Mobius, Charles Jonson, Rupert Jonson and/or Rashid Sarsenov that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Vitol, Ingma Holding B.V., Oilex N.V., Handoxx Inv. Ltd, Compass Global Investments Closed Unit Investment Fund, Merix International Ventures, Kipros Ltd, Enviro Pacific Investments, Xena Inv. Sarl, and/or Omega Cooperatief UA, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications between you and Arvind Tikku, Daniyar Abulgazin, and/or Dias

Suleimenov, that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.

- Samruk-Kazyna, KazMunayGas, AktobeMunayGas, China National Petroleum Corporation (CNPC), Darley Investments Service, CNPC International (Caspian) Ltd, Eastview Investments Ltd, Maten, Matoil S.A., Caspi Neft, Precious Oil Products B.V., Glenville Asset Management Pte Ltd, Nostrum Oil & Gas, TenizService LLP, Waterford International Holding Ltd, Contour Caspian Ventures Ltd, MI SWACO Company, Kaz M-I LLP, and/or Tengizchevroil, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications between you and Nurlan Sauranbayev, and/or Magzum Myrzagaliev that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Steppe Capital Pte. Ltd, Steppe Unity Cooperative U.A., AT Capital Pte. Ltd, KazStroyService, Nostrum Oil & Gas, Altynalmas, Aquila Gold B.V., Aquila Properties Investments B.V., Sumeru Gold B.V., Sumeru LLP, Polymetal International PLC, Turquoise Hill Resources, Almaty International Airport, Venus Airport Holdings B.V., TAV Airport Holding, Groupe ADP, Chimpharm JSC, Central Asia Pharma Holding B.V., and/or Samruk-Pharmacia, and all parents, subsidiaries, affiliates, related entities, employees, and agents.
- Steppe Cement Holding B.V., United Cement Group PLC, Central Asia Cement JSC, Inter Investment Consolidation Group Limited, Raycross Limited, Raybird Limited, Rayblock Limited, Quavasaycement JSC, Bekabadcement JSC, Yangi-Yul Grinding Station, Kant Cement Plant, Technolin, Kuznetsk Cement Plant, Novotroitsk Cement Plant and/or Karaganda Cement Plant, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communication between you and Gulnara Karimova, Askar Akayev, Aidar Akayev, Kurmanbek Bakiyev, Maxim Bakiyev, Nurlan Bizakov, Bahit Joloman, Pavel Borissov, Aibar Burkitbayev, Lyazzat Daurenbekova, Adal Issabekov, and/or Kairat Omarov that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Baring Vostok Funds, UBS Securities LLC (New York), Bank Kaspi.kz, Ozon Holdings PLC, Nostrum Oil & Gas, Caspian Gas Corporation (the Shagyrly-Shomyshty gas field), American International Petroleum Corporation, and/or KazAzot, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communication between you and Kairat Kelimbetov, Kairat Satybaldy, Vyacheslav Kim, Mikhail Lomtadze, and/or Michael Calvey that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.

- Paladigm Capital, Compass Funds, Sturgeon Funds, SkyBridge Invest, SB Capital, Tau Capital, Spring Funds, Kazimir Partners, and/or Renaissance Funds, and all parents, subsidiaries, affiliates, related entities, employees, and agents.
- Halyk Bank, Kazkommertsbank, BTA Bank, RBK Bank, First Heartland Jýsan Bank, and/or Alliance Bank, and all parents, subsidiaries, affiliates, related entities, employees, and agents.
- Kazakhtelecom, Bodam B.V., Deran Services B.V., TeliaSonera (Telia), Turkcell, Fintur Holding B.V., Sonera Holding B.V., Kcell (formerly, GSM Kazakhstan LLP), AR-Telecom LLP, KT-Telecom LLP, KazNet Media LLP, Midas Telecom LLP, Mymari Holding B.V., Rimbor Holding & Finance B.V., Lavita Holding B.V., UNA SCA, UNA Management S.a.r.l., Panev S.A., Kauz Services S.a.r.l., Keisecker TeliaSonera Assignments B.V., Alem Communications Holding LLP, KazTransCom, Alatau LLP, Rodnik Ink LLP, Telekom Asia LLP, Lavou B.V., Almaty Engineering Company LLP, Terra Management LLP, Dekson Services B.V., Verbela Participations S.A., Telecom Asia LLP, and/or Bleston Finance Ltd, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communication between you and Alexander Mirchev, Alexander Khlebanov, Kairat Satybaldy, Marat Beketayev, Serik Burkitbayev, Pieter Hamelink, Veysal Aral, Lars Nyberg, and/or Tero Kivisaari that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Ncell (formerly, Spice Nepal), Applifone, Nepal Satellite, UTA Holding B.V., TeliaSonera Asia Holding B.V., Asia Holding B.V., Airbell Services Ltd, Anu Oil Ltd, Zhodar Investments Ltd, TeliaSonera Norway Nepal Holding AS, SEA Telecom Investments B.V., Panorpa Holding B.V., Visor Growth Fund B.V., Alkatento Trading Ltd, ASIA Telecom Grouping Ltd, Meridian CIS Ltd, Axiata Group, and/or Advanced Bank of Asia (ABA) and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communication between you and King Gyanendra of Nepal, Raj Bahadur Singh, Upendra Mahato, Pushpa Kamal Dahal, Madhav Kumar Nepal, Baburam Bhattarai, Samata Prasad, Yves Jacquot, Andre Berard, Dominic Jacques and/or Hun Sen that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Meridian Capital Limited, Meridian CIS Limited, Capital Partners, Extell Development, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All information regarding the development project in New York, including but not limited to: “The International Gem Tower”, 50 West 47<sup>th</sup> Street, New York, NY; “One 57”, 157 West 57<sup>th</sup> Street, New York, NY; “Central Park Tower”, 217 West 57<sup>th</sup> Street, New York, NY; 50 West 66<sup>th</sup> Street, New York, NY. All communications between you and Gary Barnett, Nurzhan Subkhanberdin, Askar Alshinbayev,



Yevgeniy Feld, Sauat Mynbayev, and/or Serzhan Zhumashov that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.

- 1Malaysia Development Berhad (1MDB) and all parents, subsidiaries, affiliates, related entities, employees, and agents; all communications between you and Najib Razak, Daniyar Nazarbayev (Kessikbayev), Nooryana Najwa Najib, Maira Nazarbayeva (Kessikbayeva), and/or Riza Shahriz bin Abdul Aziz (Riza Aziz) that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- All information pertaining to investments owned, managed or controlled by Aidan Karibzhanov, either directly or through nominees, relating to or invested with the Mubadala Funds, including its global subsidiaries, affiliates, investment vehicles, employees and agents. All communications regarding Mubadala, Mubadala Development Company, Thirty Seventh Investment Company LLC, MIC Capital Management UK LLP, MIC Capital Partners, MDC Venture Capital and/or banks in the UAE and other jurisdictions, and all parents, subsidiaries, affiliates, related entities, employees, and agents utilized for such purposes; all communications between you and Sheikh Mohammed bin Zayed Al Nahyan, Sheikh Mansour bin Zayed Al Nahyan, Ibrahim Souheil Ajami, Hani Barhoush, and/or Christopher Fazekas that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- All information pertaining to investments owned, managed or controlled by Aidan Karibzhanov, either directly or through nominees, relating to or invested with Kaz Minerals or Kazakhmys. All communications regarding the Kaz Minerals, Kazakhmys, Lafonda Invest Pte. Ltd., Lafonda Holding Pte. Ltd; Lafonda Limited, Navono Limited, Sigiriya Ltd, Enigma Invest Pte. Ltd, Berguolla Limited, Aratan Capital Pte. Ltd, Algaria Limited, Lynchwood Nominees Limited, Abogado Pte. Ltd, Wong & Leow LLC, Baker & McKenzie, and/or SkyBridge Invest, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications regarding the Koksay Copper Field Project, Koksay Muzbel LLP, Bellarmine Finance S.A., CCC Mining Construction B.V., Konsolidirovannaya Stroitel'naya Gornorudnaya Kompaniya LLP, and Consolidated Nord B.V., and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications regarding the East Akzhar Oil Field Project, Kazakhmys Petroleum, Falcon Funds, Aman Munai, Asia Oil Investment (BVI) Ltd, and/or Dostan-Temir LLP, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications regarding the Baimskaya Copper Field Project, Amereus Group Pte. Ltd, Aristus Holdings Limited, Ferris Services Limited, and/or Allen Overseas Company Limited, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications between you and Roman Abramovich, Maxim Vorobyev, Bolat Nazarbayev, Vladimir Kim, Eduard Ogay (Ogai), Nurtai Abykayev, Dzhambulat Sarsenov, Marat Sarsenov,



Nurlan Sauranbayev, and/or Oleg Novachuk that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.

- All documents concerning the purchase of 240 Riverside 6A LLC, 240 Riverside 6D LLC, and/or 240 Riverside 6E LLC, by nominees from Nursultan Nazarbayev and his family and nominees from Saudi Prince Nawwaf bin Sultan bin Abdulaziz Al-Saud.
- One & Only Realty, Alfa Consulting Group, and/or Rheem Bell & Freeman LLP, and all parents, subsidiaries, affiliates, related entities, employees, and agents. All communications with Edward A. Mermelstein, Christine Bell, and/or Aiya Tulemaganbetova, that in any way pertain to Aidan Karibzhanov, his nominees, and/or his assets and instructions.
- Records of payments from all individuals and companies mentioned by name in this letter to you as well as from you to such individuals and companies, or to any account intended to benefit you, whether from these individuals and companies directly or from any third party that in any way pertain to Aidan Karibzhanov and/or his assets and instructions.
- Any and all shell companies, trusts, and other structures owned, controlled or utilized by Aidan Karibzhanov either directly or indirectly through strawmen or nominees.
- All communications with Aidan's banking partners relating to Aidan in any manner, including but not limited to Citibank; JP Morgan & Chase; Bank of America; BofI Federal Bank; Goldman Sachs; BNP Paribas; UBS; Falcon Private Bank Ltd.; Credit Suisse AG; Credit Suisse Singapore; HSBC Bank; HSBC Hong Kong; Deutsche Bank (Switzerland) Ltd; ING Bank; DHB Bank; Triodos Bank; Banque Internationale a Luxembourg; EFG Bank S.A.; EFG Bank (Monaco); EFG Bank & Trust (Bahamas) Ltd; SIX SIS AG; Amber Bank Trust Ltd; BSI Overseas (Bahamas) Ltd; CBH Compagnie Bancaire Helvetique SA; Julius Baer AG; Julius Baer (Monaco) S.A.M.; Bordier & Cie; Lloyds Bank; Royal Bank of Scotland; Advanced Bank of Asia (ABA) Bank; and/or National Bank of Canada.
- Documents relating to Aidan Karibzhanov's interests in U.S. real estate ventures, including but not limited to: 240 Riverside Boulevard, New York, NY; 212 5<sup>th</sup> Avenue, New York, NY; 322 West 57<sup>th</sup> Street, New York, NY. In addition: 1 Central Park South (768 5<sup>th</sup> Avenue) New York, NY; Cipriani Club Residences, 55 Wall Street, New York, NY; 80 Columbus Circle, New York, NY; 150 Charles Street, New York, NY; 520 Park Avenue, New York, NY; 129 Grand St., Apt. 4, New York, NY; 123 East 10th St., New York, NY; 407 East 75th St., New York, NY; 398 Park Ave., New York, NY; 161 West 61st St., New York, NY; 216 Sagaponack Rd., Bridgehampton, NY; 228 Sagaponack Rd., Bridgehampton, NY; 2 Margo Way,

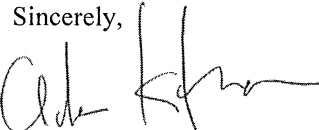
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Alpine, NJ; 724 9<sup>th</sup> St. NW, Washington DC; 8100 Spring Hill Farm Dr., McLean, VA; 6804 Benjamin St., McLean, VA; 100 E Island Blvd, Aventura, FL; 60-62 Beverly Park Cir, Beverly Hills, CA; and 33 Skyridge, Newport Beach, CA. Such documentation to include all information relating to the purchase and financing of such properties, offshore structures used to own and/or pay for such properties, and names of individuals who directly and indirectly controlled such properties.

We are hopeful that we will be able to obtain this information and evidentiary material from you without need for costly and time-consuming litigation and investigation. We are available to discuss this notification with your counsel.

We regret the imposition of this notice on you. Our client's claims are against her ex-husband. She is entitled to half of the marital estate, and since Karibzhanov is unwilling to negotiate a settlement, we have no choice but to prove the extent and value of his vast and secretive holdings. Hence, this notification to you.

Sincerely,  
  
Adam S. Kaufmann